1	Susan S.Q. Kalra (CA State Bar No. 16740)
2	Email: skalra@rameyfirm.com	,
3	RAMEY LLP 5020 Montrose Blvd., Suite 800	
	Houston, TX 77006	
4	Telephone: (800) 993-7499 Fax: (832) 900-4941	
5		
6	William P. Ramey, III (Admitted pro hac v. Email: wramey@rameyfirm.com	ice)
7	RAMEY LLP	
8	5020 Montrose Blvd., Suite 800 Houston, TX 77006	
9	Telephone: (713) 426-3923	
10	Fax: (832) 689-9175	
11	Attorneys for Plaintiff LAURI VALJAKKA	
		STATES DISTRICT COURT
12		
13		RN DISTRICT OF CALIFORNIA
14	OAK	KLAND DIVISION
15	LAURI VALJAKKA,	
16	Plaintiff,	Case No. 3:22-cv-01490-JST
17		[PROPOSED] ORDER GRANTING
18	V.	PLAINTIFF LAURI VALJAKKA'S
19	NETFLIX, INC.,	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL
20	Defendant.	
21		 -
22		
23		
24		
25		
26		
27		
28	IDDODOGEDI ODDED CD ANTING DI	1 AINTIFF'S ADMINISTRATIVE MOTION TO SEAL
_ · I	i PROPOSEDLORDER GRANTING PL	ADDITER SALDVIDISTRATIVE WICHTON TO SHAL

Case No. 4:22-CV-01490-JST

On October 6, 2023, Plaintiff Lauri Valjakka ("Valjakka") filed its Administrative Motion to File Documents Under Seal ("Motion to Seal") which is narrowly tailored to seal only the sealable material pursuant to Civil Local Rules 7-11 and 79-5. Plaintiff Valjakka lists the table below for each document or portion thereof that is sought to be sealed.

The Court having reviewed the evidence in support of the Motion to Seal, finds that the following: (1) Valjakka's Response to Motion for Summary Judgment in part, Declaration of Tibor Kozek and five exhibits, A, M, O, P and R to the Ramey Declaration; (2) Valjakka's Response to Exclude Response to Motion to Exclude Portions of the Opinions and Testimony of Robert Held, Exhibits to Response A, B, C, D, E, H, I, J, K and M ("Exhibits") constitutes sealable material under Local Rule 79-5.

Document (s)	Portions to Considered to be Sealed	Designating Party	Basis for Request to File Under Seal	Court's Ruling
Response to Motion for Summary Judgment	Portions	Netflix or Valjakka	Opposition to Motion for Summary Judgment Portions sought to be sealed specify or refer to materials that were designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Valjakka or Netflix pursuant to the parties' Stipulated Protective Order and is thus being filed under seal. Valjakka respectfully requests that portions of the Opposition to Motion for Summary Judgment be sealed.	

Document(s)	Portions to Considered to be Sealed	Designating Party	Basis for Request to File Under Seal	Court's Ruling
Declaration of Tibor	Entirety	Valjakka	The Declaration of Tibor Kozek, Valjakka's technical	
Kozek - Response to			expert, is highly-confidential	
Motion for Summary			This document was designated "HIGHLY	
Judgment			CONFIDENTIAL –	
			ATTORNEYS' EYES ONLY" by counsel for	
			Valjakka pursuant to the parties' Stipulated Protective	
			Order and is thus being filed under seal.	
			Valjakka respectfully requests that the Declaration	
			of Tibor Kozek be redacted in its entirety.	
Ex. A to Ramey	Entirety	Valjakka	Exhibit A is a highly- confidential license	
Declaration - Response to			agreement	
Motion for			This document was	
Summary Judgment			designated "HIGHLY CONFIDENTIAL –	
			ATTORNEYS' EYES ONLY" by counsel for	
			Valjakka pursuant to the parties' Stipulated Protective	
			Order and is thus being filed	
			under seal.	
			Valjakka respectfully requests that Exhibit A be	
Ex. M to	Portions	Valjakka	redacted in its entirety. Exhibit M is a highly-	
Ramey	1 Ordons	v urjaixixa	confidential expert report by	
Declaration - Response to			Valjakka's infringement expert	
Motion for Summary			This document was	
Judgment			designated "HIGHLY CONFIDENTIAL –	
			ATTORNEYS' EYES	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

28

Document(s)	Portions to Considered to be Sealed	Designating Party	Basis for Request to File Under Seal	Court's Ruling
	to se sease		ONLY" by counsel for Valjakka pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that Exhibit M be redacted in its entirety.	
Ex. O to Ramey Declaration - Response to	Entirety	Netflix	Exhibit O is a highly- confidential excerpt from the deposition of Ishaan Shastri	
Motion for Summary Judgment			This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Netflix pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that Exhibit O be redacted in its entirety.	
Ex. P to Ramey Declaration - Response to Motion for Summary Judgment	Entirety	Valjakka	Exhibit P is a highly-confidential excerpt from the deposition of Tibor Kozek This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Netflix pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that Exhibit P be redacted in its entirety.	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Document(s)	Portions to Considered to be Sealed	Designating Party	Basis for Request to File Under Seal	Court's Ruling
Ex. R to Ramey Declaration - Response to Motion for Summary Judgment	Entirety	Netflix	Exhibit R is a highly-confidential compilation of notes taken by Tibor Kozek during code review This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Netflix pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that Exhibit R be redacted in its entirety.	
Response to Motion to Exclude Portions of the Opinions	Portions	Valjakka	Response to Motion to Exclude Portions of the Opinions and Testimony of Robert Held	
and Testimony of Robert Held			This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Valjakka pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that Response to Motion to Exclude Portions of the Opinions and Testimony of Robert Held be redacted in its entirety.	

	Document(s)	Portions to Considered to be Sealed	Designating Party	Basis for Request to File Under Seal	Court's Ruling
	EX A Expert Report of	Entirety	Valjakka	Expert Report of EX A Tibor Kozek contains highly-	
.	Tibor Kozek			confidential information.	
	Response to Motion to			This document was designated "HIGHLY	
	Exclude Portions of			CONFIDENTIAL – ATTORNEYS' EYES	
	the Opinions and			ONLY" by counsel for Valjakka pursuant to the	
	Testimony of Robert Held			parties' Stipulated Protective Order and is thus being filed under seal.	
				under sear.	
				Valjakka respectfully	
				requests that Expert Report of EX A Tibor Kozek be redacted in its entirety.	
	EX C NFX- VALJ-	Entirety	Valjakka	EX C NFX-VALJ-00007111 financial data of NetFlix	
	00007111 -			contains highly-confidential	
	Response to Motion to			information.	
	Exclude Portions of			This document was designated "HIGHLY	
	the Opinions			CONFIDENTIAL –	
	and Testimony of			ATTORNEYS' EYES ONLY" by counsel for	
	Robert Held			Valjakka pursuant to the parties' Stipulated Protective	
				Order and is thus being filed	
				under seal.	
				Valjakka respectfully requests that EX C NFX-	
				VALJ-00007111 be redacted in its entirety.	
	EX D NFX- VALJ-	Entirety	Valjakka	EX D NFX-VALJ-00006360 contains highly-confidential	
	00006360 -			information.	
	Response to Motion to Exclude			This document was	
	Portions of			designated "HIGHLY CONFIDENTIAL –	

		Portions to	Designating	Basis for Request to File	Court's
1	Document (s)	Considered	Party	Under Seal	Ruling
2		to be Sealed	-	A FERODA IEA/GA EA/EG	_
3	the Opinions and			ATTORNEYS' EYES ONLY" by counsel for	
	Testimony of			Valjakka pursuant to the	
4	Robert Held			parties' Stipulated Protective	
5				Order and is thus being filed under seal.	
6				Valjakka respectfully	
7				requests that EX D NFX-	
$_{8}\parallel$				VALJ-00006360 be redacted in its antirety	
9	EX H	Entirety	Valjakka	in its entirety. EX H Deposition excerpt of	
	Deposition	•	3	Henen Ponce contains	
10	excerpt of Henen Ponce			highly-confidential information.	
11				information.	
12	Response to			This document was	
13	Motion to Exclude			designated "HIGHLY CONFIDENTIAL –	
13	Portions of			ATTORNEYS' EYES	
14	the Opinions and			ONLY" by counsel for Valjakka pursuant to the	
15	Testimony of			parties' Stipulated Protective	
16	Robert Held			Order and is thus being filed under seal.	
17				under seur.	
				Valjakka respectfully	
18				requests that EX H Deposition excerpt of Henen	
19				Ponce be redacted in its	
20	EX I	Entiroty	Valjakka	entirety. EX I Deposition excerpt of	
$_{21} \parallel$	Deposition	Entirety	v aijakka	Robert Held contains highly-	
	excerpt of			confidential information.	
22	Robert Held			This document was	
23	Response to			designated "HIGHLY	
24	Motion to			CONFIDENTIAL –	
25	Exclude Portions of			ATTORNEYS' EYES ONLY" by counsel for	
	the Opinions			Valjakka pursuant to the	
26	and Tastimony of			parties' Stipulated Protective	
27	Testimony of Robert Held			Order and is thus being filed under seal.	

Court's Ruling

1	Document(s)	Portions to Considered	Designating Party	Basis for Request to File Under Seal
2		to be Sealed	1 ur ty	Chaci San
3				Valjakka respectfully
4				requests that EX H EX I Deposition excerpt of Robert
5				Held be redacted in its
5				entirety.
6	EX J Expert Report	Entirety	Valjakka	EX J Expert Report of Robert Held contains highly-
7	of Robert			confidential information.
8	Held –			
	Response to Motion to			This document was designated "HIGHLY
9	Exclude			CONFIDENTIAL –
10	Portions of			ATTORNEYS' EYES
11	the Opinions and			ONLY" by counsel for Valjakka pursuant to the
12	Testimony of			parties' Stipulated Protective
	Robert Held			Order and is thus being filed under seal.
13				under sear.
14				Valjakka respectfully
15				requests that EX J Expert Report of Robert Held be
16				redacted in its entirety.
	EX K	Entirety	Valjakka	EX K Supplemental Expert
17	Supplemental Expert Report			Report of Robert Held contains highly-confidential
18	of Robert			information.
19	Held – Response to			This document was
20	Motion to			designated "HIGHLY
21	Exclude Portions of			CONFIDENTIAL – ATTORNEYS' EYES
	the Opinions			ONLY" by counsel for
22	and Testimony of			Valjakka pursuant to the parties' Stipulated Protective
23	Robert Held			Order and is thus being filed
24				under seal.
25				Valjakka respectfully
26				requests that EX K Supplemental Expert Report
27				of Robert Held be redacted in its entirety.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

28

Document(s)	Portions to	Designating	Basis for Request to File	Court's
	Considered	Party	Under Seal	Ruling
	to be Sealed	·		O
EX M Rebuttal Report of Nish Mody – Response to Motion to Exclude Portions of the Opinions and Testimony of Robert Held	Entirety	Valjakka	EX M Rebuttal Report of Nish Mody contains highly-confidential information. This document was designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by counsel for Valjakka pursuant to the parties' Stipulated Protective Order and is thus being filed under seal.	
			Valjakka respectfully requests that the EX M	
			Rebuttal Report of Nish	
			Mody be redacted in its	
			entirety.	

Therefore, IT IS HEREBY ORDERED that Plaintiff Valjakka's Administrative Motion is GRANTED. Valjakka's (1) Response to Motion for Summary Judgment in part, Declaration of Tibor Kozek and five exhibits, A, M, O, P and R to the Ramey Declaration, (2) Valjakka's Response to Exclude Response to Motion to Exclude Portions of the Opinions and Testimony of Robert Held, Exhibits to Ramey Declaration A, B, C, D, E, H, I, J, K and M shall be filed under seal pursuant to L.R. 79-5(c).

IT IS SO ORDERED.

DATED: _____

Hon. Jon S. Tigar United States District Court Judge